

1 [Counsel Listed Below]
2
3
4
5
6
7
8

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

12 **IN RE STATIC RANDOM ACCESS
13 MEMORY (SRAM) ANTITRUST
14 LITIGATION**

) Case No. M:07-cv-01819-CW
)
) MDL No. 1819
)
) **STIPULATION AND ORDER
REGARDING REVISED CASE
MANAGEMENT SCHEDULE
AS MODIFIED**

16 **This Document Relates to:**

17 **ALL ACTIONS**

19 WHEREAS, fact discovery for both the Direct-Purchaser and Indirect-Purchaser actions
20 is ongoing;

21 WHEREAS, all Parties are in agreement on the proposed modifications to the case
22 management schedule;

23 WHEREAS, the Parties agree that the additional time resulting from the extension of the
24 fact discovery cut-off will not be used in order to take depositions in excess of those permitted
25 pursuant to the Order re: Deposition in this case (Dkt.# 672);

1 WHEREAS, the Court in its August 4, 2009 order indicated that the Parties' proposed
2 new trial date of October 12, 2010 was not available, and that the Parties should contact the
3 Court's clerk regarding alternate available trial dates; and,

4 WHEREAS, the Court's clerk informed the Parties on August 5, 2009 that a **new trial**
5 **date of January 11, 2011** is available;

6 IT IS HEREBY STIPULATED by the undersigned counsel on behalf of the Parties
7 identified below, that the case management schedule is amended as outlined in Exhibit A,
8 attached hereto, which changes the case management schedule as follows:

9 (1) All fact discovery will close on December 11, 2009;
10 (2) The last day for Plaintiffs to serve expert reports on merits is moved to January 25,
11 2010;
12 (3) The last day for Defendants to serve expert reports on merits is moved to March 26,
13 2010;
14 (4) The last date for Plaintiffs to serve expert reply reports on merits is moved to April
15 26, 2010;
16 (5) Expert discovery will close on May 28, 2010;
17 (6) The last day to file dispositive motions is moved to June 10, 2010;
18 (7) The last day to file oppositions to dispositive motions is moved to July 22, 2010; and,
19 (8) The last day to file replies to dispositive motions is moved to August 12, 2010.
20 (9) **The hearing date on dispositive motions is moved (from May 13, 2010) to**
21 **September 9, 2010.**
22 (10) **The pre-trial conference is moved (from August 3, 2010) to November 30,**
23 **2010.**
24 (11) **The trial date is moved (from September 7, 2010) to January 11, 2011.**

25 Dated: August 12, 2009

By: /s/ Joseph W. Cotchett
Joseph W. Cotchett

26 Joseph W. Cotchett
jcotchett@cpmlegal.com
27 Steven N. Williams
sWilliams@cpmlegal.com

1 Neil Swartzberg
2 nswartzberg@cpmlegal.com
3 COTCHETT, PITRE & McCARTHY
4 840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: (650) 697-6000
Facsimile: (650) 697-0577

5 *Lead Counsel for the Direct-Purchaser Class*

6 Dated: August 12, 2009

7 By: /s/ Francis O. Scarpulla
Francis O. Scarpulla

8 Francis O. Scarpulla
fscarpulla@zelle.com
9 Craig C. Corbitt
ccorbitt@zelle.com
10 Christopher Micheletti
cmicheletti@zelle.com
11 ZELLE HOFMANN VOELBEL & MASON
44 Montgomery Street, Suite 3400
San Francisco, CA 94104
Telephone: (415) 693-0700
Facsimile: (415) 693-0770

12 *Interim Lead Counsel for the Indirect-
Purchaser Class*

13 Dated: August 12, 2009

14 By: /s/ Paul R. Griffin
Paul R. Griffin

15 Robert Pringle
rpringle@winston.com
16 Paul R. Griffin
pgriffin@winston.com
17 Jonathan Swartz
jswartz@winston.com
18 WINSTON & STRAWN, LLP
19 101 California Street
20 San Francisco, CA 94111
21 Telephone: (415) 591-1000
22 Facsimile: (415) 591-1400
23 *Liaison Counsel for Defendants*

24 **IT IS SO ORDERED.**

25 **8/18**



26 **DATED: _____, 2009**

27 Hon. Claudia Wilken

28 *United States District Judge
Northern District of California*

ATTESTATION OF FILING

Pursuant to N.D. Cal. General Order No. 45, section 45 X(B), I, Neil Swartzberg, hereby attest that concurrence in the filing of this stipulation and proposed order has been obtained from the individuals from whom I have provided the conformed signatures above.

COTCHETT, PITRE & McCARTHY

By: _____ /s/ *Neil Swartzberg*
Neil Swartzberg

Lead Counsel for the Direct-Purchaser Class

EXHIBIT A**Case Management Schedule**

Event	Current Date	Stipulated and Agreed Date	Ordered Date
Hearing on motion for Indirect-Purchaser Plaintiff motion for class certification And Further Case Management Conference	9/3/09 at 2:00 p.m.	No Change	9/3/09
All fact discovery closes	9/4/09	12/11/09	12/11/09
Last date for Plaintiffs to serve expert reports on merits	10/14/09	1/25/10	1/25/10
Last date for Defendants to serve expert reports on merits	12/4/09	3/26/10	3/26/10
Last date for Plaintiffs to serve expert reply reports on merits	12/23/09	4/26/10	4/26/10
Close of expert discovery	1/22/10	5/28/10	5/28/10
Last date to file dispositive motions. (Parties to file joint motions to the extent possible.)	2/11/10	6/10/10	6/10/10
Last date to file oppositions to dispositive motions.	3/25/10	7/22/10	7/22/10

Event	Current Date	Stipulated and Agreed Date	Ordered Date
Last date to file replies to dispositive motions.	4/15/10	8/12/10	8/12/10
Hearing on dispositive motions and Further Case Management Conference	5/13/10 at 2:00 p.m.	9/9/10 at 2:00 p.m.	9/9/10
Pre-trial Conference	8/3/10 at 2:00 p.m.	11/30/10 at 2:00 p.m.	11/30/10
Trial Date	9/7/2010 at 8:30 a.m. (2 months)	1/11/11 at 8:30 a.m. (2 months)	1/10/11